

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

HANNAH CRAMER, et al.,

Plaintiffs,

v.

ARKESIA, INC. d/b/a CLUB ROUGE, et al.,

Defendants.

Case No. 3:18-cv-00039

**DEFENDANTS’ MOTION TO DISMISS OPT-IN PLAINTIFF MEGHAN MUSTO’S
FIRST AMENDED COMPLAINT OR, IN THE ALTERNATIVE, TO COMPEL
ARBITRATION AND STAY PROCEEDINGS PENDING ARBITRATION**

NOW COMES Defendant Arkesia, Inc. d/b/a Club Rouge (“Club Rouge”), Circle 2, Inc. d/b/a Daddy Rabbits (“Daddy Rabbits”), Circle 2, Inc. d/b/a Candy Bar (“Candy Bar”), Imaginary Images, Inc. d/b/a Paper Moon (“Imaginary Images”), BTF3, Inc. d/b/a Papermoon (“BTF3”), MGB., Inc. d/b/a Pure Pleasure (“Pure Pleasure”), and William Andrea Pyliaris (“Pyliaris”) (collectively “Defendants”) by counsel, and respectfully move this Court, pursuant to Federal Rule of Civil Procedure 7 and 12(b) and the Federal Arbitration Act, 9 U.S.C. §§ 1 et seq., and the arbitration agreements between the parties, to dismiss Opt-in Plaintiff Meghan Musto’s First Amended Complaint in its entirety or, in the alternative, to compel arbitration and stay their suit. In support of this Motion, the Defendants are contemporaneously filing their Memorandum in Support. For the reasons set forth in this Motion and explained more thoroughly in the Memorandum, Defendants respectfully ask this Court to grant this Motion, enter judgment in their favor and dismiss Opt-in Plaintiff Meghan Musto’s First Amended Complaint in its entirety.

Dated: April 13, 2018

Respectfully submitted,

**Arkesia, Inc. d/b/a Club Rouge,
Circle 2, Inc. d/b/a Daddy Rabbits,
Circle 2, Inc. d/b/a Candy Bar,
Imaginary Images, Inc. d/b/a Paper Moon,
BTF3, Inc. d/b/a Papermoon,
MGB., Inc. d/b/a Pure Pleasure,
AND William Andrea Pyliaris**

By: _____/s/

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CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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